

CHRISTIE ANDREWS, )  
)  
Plaintiff, )  
)  
v. )  
)  
TRI STAR SPORTS AND )  
ENTERTAINMENT GROUP, INC., )  
)  
Defendant. )

CASE NO. 3:21-cv-00526

Judge Eli J. Richardson  
Magistrate Judge Jefferey S. Frensley

JURY DEMAND

Pursuant to Local Rule 7.01, Defendant Tri Star Sports and Entertainment Group, Inc. (“Tri Star” or “Defendant”) respectfully moves this Court to extend certain discovery deadlines in the September 20, 2022 Initial Case Management Order (Doc. 12.), for good cause shown. This Motion is unopposed. Tri Star requests to extend the following deadlines:

Defendant Expert Disclosures: from **August 31, 2022** to **October 31, 2022**

Joint Status Report:	June 24, 2022
Final Written Discovery Served:	May 11, 2022
Motions to Amend:	November 1, 2021
Dispositive Motions:	November 3, 2022
Pretrial Conference:	April 3, 2023

Trial Date: April 11, 2023

Extending the current discovery deadlines is necessary, as Tri Star is still actively collecting Plaintiff's medical and employment records. Plaintiff provided signed releases for these records on April 28, 2022 (medical) and May 2, 2022 (employment), after this Court compelled her to do so. Tri Star is diligently working to collect all records. Extending the deadline for depositions and expert discovery will allow the parties to complete the collection of these mitigation and damages records in order to properly prepare for depositions, and to give any expert witnesses a complete picture of the facts.

The requested extensions will not delay the case or impact other deadlines in place. The requested extension will still conform to the requirements of Local Rule 16.01(h)(1) that no dispositive motion deadline, including response and reply briefs, shall be later than 90 days in advance of the trial date. Plaintiff consents to the relief requested. For these reasons, Tri Star respectfully requests that the following deadlines be extended:

Complete Depositions: **August 31, 2022**

File Discovery Motions: **September 7, 2022**

Plaintiff Expert Disclosures: **September 30, 2022**

Defendant Expert Disclosures: **October 31, 2022**

Tri Star requests that all other deadlines remain in place, including the May 11, 2022 deadline to serve written discovery.

Respectfully Submitted,

/s/ Elizabeth G. Hart  
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*Attorneys for Tri Star Sports &  
Entertainment Group, Inc.*

**CERTIFICATE OF CONFERENCE**

I hereby certify that I conferred with counsel for Plaintiff by email regarding this Motion.  
Plaintiff consents to the relief requested.

/s/ Elizabeth G. Hart  
Elizabeth G. Hart

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been served via the Court's Electronic Filing System on:

Daniel Eduardo Arciniegas  
Arciniegas Law  
1242 Old Hillsboro Road  
The Atrium Building  
Franklin Tennessee 37069  
Daniel@attorneydaniel.com

on this 9<sup>th</sup> day of June 2022.

/s/ Elizabeth G. Hart  
Elizabeth G. Hart